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May 13, 2025

**VIA ELECTRONIC FILING**

Honorable Wendy A. Kinsella  
United States Bankruptcy Court  
Northern District of New York  
100 South Clinton Street  
Syracuse, New York 13202

Re: *The Roman Catholic Diocese of Syracuse, New York;*  
*Chapter 11 Case No. 20-30663*

Dear Chief Judge Kinsella:

As requested by the Court at the hearing held on April 28, 2025, the Roman Catholic Diocese of Syracuse, New York (the "Diocese") and the Official Committee of Unsecured Creditors (the "Committee," and, together with the Diocese, the "Plan Proponents") are providing a report to the Court regarding progress on certain outstanding matters in advance of the adjourned hearing date of May 14, 2025 to consider confirmation the *Fifth Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* (the "Plan")<sup>1</sup>.

Since the April 28, 2025 hearing, the Plan Proponents have been working with Travelers Insurance Company Limited, Travelers Casualty and Surety Company and Traveler's Indemnity Company ("Travelers") in an attempt to reach a settlement similar to those reached with other insurers and reported on the docket, and these efforts are continuing. The Plan Proponents have also been working with the Office of the United States Trustee to attempt to address remaining objections to the confirmation of the Plan and, in connection with these discussions, the Plan Proponents have been reviewing and analyzing the claims of Abuse Claimants who did not submit ballots.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

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To further advance these efforts, the Plan Proponents seek an adjournment of the continued hearing to consider confirmation of the Plan currently scheduled for May 14, 2025 to June 5, 2025.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC



Stephen A. Donato

cc: All ECF notice parties